

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

\*

**vs.**

\* **JKB-22-439**

**DAVID WARREN**

\*

**Defendant**

\*

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR FILING  
PRETRIAL MOTIONS**

Defendant David Warren, by and through his attorneys, John M. McKenna, Michael E. Lawlor, Adam C. Demetriou, and Brennan, McKenna & Lawlor, Chtd., respectfully requests that this Honorable Court continue the deadline for the filing of pretrial motions in this case. In support of this Motion, counsel state the following.

1. On December 15, 2022, Mr. Warren, Mr. Olds, Mr. Harrison, Mr. Prince, Mr. Duffy, and Mr. Jeffries were charged in a one-count Indictment with racketeering conspiracy, in violation of 18 U.S.C. § 1962(d). (Indictment, ECF No. 1.) The Indictment alleges that beginning in or about 2014 and continuing through the date of the Indictment, the defendants in this case conspired to participate in the affairs of the Black Guerilla Family. The Indictment alleges 48 overt acts in furtherance of the charged racketeering conspiracy, including several murders and attempted murders.

2. By an Order dated May 31, 2023, this Court established a non-*Jencks* discovery deadline of July 17, 2023 and a deadline for the defendants to file pretrial motions of October 30, 2023. (Order, ECF No. 77.) The Court also set a telephonic scheduling conference for November 1, 2023 at 2:30 p.m. (Paperless Order, ECF No. 80.)

3. At this time, Mr. Warren respectfully requests that this Court extend the deadline for filing pretrial motions through November 30, 2023.

4. As discussed during the last scheduling conference with the Court on May 18, 2023, the discovery in this case is voluminous. The Government has made five discovery productions so far. The discovery materials include police reports and files, DNA reports, laboratory results, bodyworn camera footage, surveillance footage, recorded statements, search warrant materials, photographs, social media materials, cell phone downloads, and other items. Earlier this month, the undersigned counsel conferred with counsel for the Government on the status of discovery. These conversations have been productive. The Government has requested that counsel for all defendants return their discovery hard drives to the United States Attorney's Office in anticipation of another production. The undersigned counsel have sent those drives to the Government.

5. In light of the volume of discovery produced so far and the forthcoming production, Mr. Warren respectfully requests that this Court extend the deadline for

the filing of pretrial motions through November 30, 2023. This extension will allow the undersigned counsel to continue to review the discovery materials, discuss them with Mr. Warren, and prepare pretrial motions.

6. The undersigned counsel have conferred with counsel for the other defendants. As of the filing of this Motion, counsel for all defendants except for Mr. Jeffries have indicated that they do not oppose the requested extension. The undersigned counsel have not received a response from counsel for Mr. Jeffries.

7. The undersigned counsel have also conferred with Assistant United State's Attorney P.J. Martinez, who has indicated that the Government does not oppose the requested extension.

8. Counsel for Mr. Harrison has indicated that he would like to maintain the November 1, 2023 scheduling conference with the Court.

9. For these reasons, Mr. Warren respectfully requests that this Court extend the deadline by which to file pretrial motions through November 30, 2023. Mr. Warren respectfully requests that the Court maintain the November 1, 2023 telephone conference and schedule a further telephone conference in early December 2023, after motions have been filed.

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, October 13, 2023, a copy of the foregoing sent via ECF to all parties.

/s/

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John M. McKenna